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April 11, 2001

Commanding Officer
Naval Facilities Engineering Command
Department of the Navy Southwest Division
1220 Pacific Highway
San Diego, California 92132-5190
Attn: Richard Mach
BRAC Environmental Coordinator
Hunters Point Shipyard

Re: Lennar/BVHP Comments on the "General Work Plan Excavation of
Impacted Soil and Closure of Abandoned Steam and Fuel Pipelines"

Dear Mr. Mach:

Enclosed are comments from Lennar/BVHP Partners on the "General Work
Plan Excavation of Impacted Soil and Closure of Abandoned Steam and Fuel Pipelines"
Hunters Point Shipyard, San Francisco, California."

Please call me at (415) 774-2946 if you have any questions. I apologize
that our comments were delayed a few days, but I have just returned from traveling out of
state.

Very truly yours,



M. Elizabeth McDaniel

for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Enclosure

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cc: Ms. Claire Trombadore EPA Region IX
Mr. Michael Work, EPA Region IX
Mr. Chein Kao DTSC
Mr. Brad Job RWQCB
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Mr. Roy Willis

LENNAR /BVHP COMMENTS ON “General Work Plan Excavation of Impacted Soil and Closure of Abandoned Steam and Fuel Pipelines Hunters Point Shipyard, San Francisco, California

The following are Lennar/BVHP Partners’ comments on the above-referenced document.

1. The purpose of the General Work Plan has not been established. The introduction to this document should indicate that this document provides guidance for preparation of site-specific work plans for excavation of impacted soil and pipeline closure at HPS.
2. Site restoration using imported fill, as discussed on page 3-8, should state "clean" fill. The fill should be documented to meet the final ROD cleanup goals.
3. Pipeline cleaning procedures on page 5-1 indicates saddle valves will be installed at the ends of the main pipelines and at other convenient locations. Further clarifications should be provided regarding "at other convenient locations". Saddle valves only at the ends of the main pipelines will not be sufficient to determine if fluids and/or combustible vapors are present in the pipelines. The General Work Plan should require details to be included in site-specific plans.
4. On page 1-2 of Addendum 1, it is stated that approximately 20,000 feet of abandoned steam pipeline will be closed in accordance with the procedures outlined in the General Work Plan. Since this is a site-specific work plan, details on inspection locations and installation of saddle valves should be provided. Possibly, a map should be included showing such locations.